

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

1. ABRAHAM PEREZ  
A/K/A KING DIAMOND

) CRIMINAL NO. **07 CR 10149 RCL**  
) VIOLATIONS:  
)  
) 21 U.S.C. §§ 841(a)(1) -  
) Distribution of Cocaine Base  
)  
) 21 U.S.C. § 853 - Forfeiture

INDICTMENT

COUNT ONE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury charges that:

On or about May 4, 2006, at a time close to 2:00 pm., at New Bedford, in the District of Massachusetts,

1. ABRAHAM PEREZ A/K/A KING DIAMOND

the defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, cocaine base, also known as "crack," a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

A handwritten signature is enclosed in a large, roughly circular oval. The signature appears to begin with a capital letter 'J' or 'L' and ends with a small flourish.

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury further charges that:

On or about May 4, 2006, at a time close to 5:00 pm., at New Bedford, in the District of Massachusetts,

1. ABRAHAM PEREZ A/K/A KING DIAMOND

the defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, cocaine base, also known as "crack," a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base)

The Grand Jury further charges that:

On or about May 4, 2006, at a time close to 8:15 pm., at New Bedford, in the District of Massachusetts,

1. ABRAHAM PEREZ A/K/A KING DIAMOND

the defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, cocaine base, also known as "crack," a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**DRUG FORFEITURE ALLEGATION**  
**(21 U.S.C. § 853)**

The United States Attorney further charges that:

1. As a result of the offenses alleged in Counts One, Two, and Three,

1. ABRAHAM PEREZ A/K/A KING DIAMOND

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the offenses, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the properties described in paragraph 1, above, as a result of any act or omission of the defendant --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21,

United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL,

Patricia Collins  
FOREPERSON OF THE GRAND JURY

Theodore B. Heinrich  
Theodore B. Heinrich  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS

May 10, 2007

Returned into the District Court by the Grand Jurors and filed.

Mark K. Duffy, Esq.  
Deputy Clerk